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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

DEC 1 1994

Mr. Russell Jim
Confederated Tribes and Bands
of the Yakama Indian Nation
P.O. Box 151
Toppenish, Washington 98948

Dear Mr. Jim:

RECEIPT OF COMMENTS ON THE 300 AREA PROCESS TRENCH CLOSURE PLAN

The U.S. Department of Energy (DOE), Richland Operations Office (RL), acknowledges the receipt of the Confederated Tribes and Bands of the Yakama Indian Nation (YIN) letter to Mr. John Wagoner from Mr. Russell Jim "Hanford 300 Area Process Trenches Closure Plan; Disagreement with Proposed Strategy and Acceptance Criteria for Remediation; Identification of Alternative Criteria," dated October 12, 1994, and thanks the YIN for comments. This letter responds to the five issues raised in the above referenced letter. 40229

Comment #1:

It is correct that potential remediation strategies in the draft 300 Area Process Trenches (300 APT) Closure Plan are not based on an unrestricted end use criteria. It should also be noted that the draft Phase III Feasibility Study (FS) Report for the 300-FF-1 Operable Unit (OU), DOE/RL-94-49 which was sent out for review at the same time as the 300 APT Closure Plan, also does not assume an unrestricted end use. It is also acknowledged that the YIN have expressed a desire for unrestricted use of the land over and around the 300 APT and the Hanford Site in general. Land use decisions are key in the remediation process and as such are not taken lightly by RL. At the time the baseline risk assessment was being performed for the 300-FF-1 OU (which includes the 300 APT), RL, the U.S. Environmental Protection Agency (EPA), and the State of Washington Department of Ecology (Ecology) discussed land use scenarios for that OU and agreed to proceed on the basis of the industrial land use scenario. In addition, analyses for offsite residential and recreational scenarios were evaluated. The baseline risk assessment for the 300 APT is included in the 300-FF-1 OU baseline risk assessment and is documented in the 300-FF-1 Phase I Remedial Investigation (RI) Report, DOE/RL-92-43 Rev. 0. 38154 38652 32792

The RL, EPA, and Ecology decision to proceed with the industrial scenario was supported by the Hanford Site Development Plan, DOE/RL 89-15 which provided a site planning basis as a starting point for land use decision making. The document is referenced in the Hanford Site Baseline Risk Assessment Methodology (HSBRAM), DOE/RL-91-45, Rev. 2. After the Hanford Federal Facility Agreement and Consent Order decisionmakers agreed to proceed with use of an industrial scenario for the 300-FF-1 OU, the Hanford Future Site Uses Working Group was formed consisting of federal, tribal, state, and local government entities which produced the document called "The Future For Hanford: Uses and Cleanup." The report made recommendations regarding remediation scenarios that would support future land use options. Four options were considered that evaluated "all other areas" including the 300 Area. In each of these options, including the Native American Uses option, the 300 Area is identified as an industrial area in the future. It is still 27589 13171

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RL's contention that use of an industrial scenario for the 300-FF-1 OU including the 300 APT is appropriate for the 300 Area proper. It should be clarified that the "300 Area proper" as discussed in this response, refers to the generally disturbed industrial complex of the 300 Area and not areas south, west, and north of the 300 Area proper.

With respect to potential impacts to Indian burial grounds, it is agreed that areas which have not been previously disturbed need to be evaluated before actions are taken in those areas. A Cultural Resource Evaluation (Cultural Resources Review of the OU 300-FF-1 Project HCRC #94-300-056) was completed in May 1994 for the 300-FF-1 OU. Since the OU waste sites are located within 400 meters of the river, they are considered to be in a culturally sensitive area. However, the OU includes mostly liquid waste disposal facilities and waste burial sites. These areas, including the 300 APT, have been heavily excavated and disturbed and it is not expected that Indian burial grounds or other cultural resources will be found in these areas. However, the Cultural Resource Evaluation does indicate that extra care should be taken for any potential remedial action of one particular "undocumented" waste burial site right by the river.

Comment #2:

A baseline risk assessment was performed for the 300-FF-1 OU which includes most of the 300 Area liquid waste disposal sites (including the 300 APT) and is documented in the 300-FF-1 Phase I RI Report, DOE/RL-92-43. The baseline risk assessment was performed using the HSBRAM referenced above. That risk assessment evaluated three scenarios: industrial for the OU, offsite residential, and recreational along the shore of the Columbia River.

National Environmental Policy Act (NEPA) documentation, including consideration of cumulative impacts, has been factored into the draft Phase III FS Report for the 300-FF-1 OU, DOE/RL-94-49 which was sent out for review at the same time as the 300 APT Closure Plan. One of the key objectives of incorporating NEPA into the FS III is to be able to proceed with cleanup as quickly as possible in the 300 Area and not have to wait for NEPA via the Hanford Remedial Action Environmental Impact Statement. A draft appendix to the feasibility report which addresses natural resource issues is being prepared as well.

Comment #3:

The 300 APT and waste sites within the 300-FF-1 OU have involved considerable excavation of materials as a result of previous Hanford operations. Because these waste sites have all been previously disturbed, it is not expected that additional burial grounds will be found as a result of remediation actions taken within the 300-FF-1 OU. Remedial excavation work to remove contamination from the 300 APT occurred in 1991 as part of an Expedited Response Action with no noted affects to any cultural resources.

A thorough evaluation and screening of potentially applicable remediation technologies including in-situ remediation technologies was conducted for the 300 APT in the Phase I and II FS Report for the 300-FF-1 OU, DOE/RL-92-46 Rev. 0. Some of the in-situ technologies that were screened include

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biological treatment, stabilization/solidification, and physical treatment, all of which had a number of process options. Therefore, it is felt that additional in-situ remediation technologies need not be considered further.

Comment #4:

See response to comment #3. In addition, two treatability tests were implemented for soil washing, which is one of the remediation technologies that made it through the screening process in the Phase I and II FS described in comment #3. The treatability test goals were met including achieving 90% or greater weight reduction of contaminated soils. This data is reported in the 300-FF-1 OU RI Phase II Report: Physical Separation of Soils Treatability Study, DOE/RL-93-96 Rev. 1 and in the 300-FF-1 OU Physical Separation of Soils Pilot Plant Study, WHC-SD-EN-TI-277 Rev. 0, which was issued at the same time as the 300 APT Closure Plan. 38823 37800

Comment #5

Both hazardous and radioactive contaminants for the 300 APT were addressed in the baseline risk assessment performed for the 300-FF-1 OU, referenced above. The risk assessment evaluated both human and ecological risks associated with the 300-FF-1 OU waste sites. Current and future health based risks were evaluated for industrial and offsite recreational and residential uses. These risk numbers were utilized to further refine the remediation technologies in the Phase III FS referenced above and for the 300 APT. The 300-FF-1 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documentation referred to in this letter is also referenced heavily in the 300 APT Closure Plan for the purpose of integrating Resource Conservation and Recovery Act and CERCLA programs as much as possible. All of the documents referred to are available in the Administrative Record.

Again, RL would like to thank the YIN for comments on the 300 APT Closure Plan. If you have any questions related to the responses to the issues raised in the referenced letter, please contact Mr. Bob McLeod on (509) 372-0096.

Sincerely,



Julie K. Erickson, Acting Director
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PRD:RGM

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